

Portland General Electric (Nancy Bennett)

Portland General Electric Comments on Issues Raised at the Washington Department of Ecology Centralized Electricity Markets Workshop

July 30, 2025

Portland General Electric (PGE) appreciates the opportunity to provide input to the Washington Department of Ecology (Ecology) on issues discussed at the June 26th workshop on electricity imports and centralized electricity markets (CEMs).

PGE is a vertically integrated electric utility engaged in the generation, purchase, transmission, distribution, and retail sale of electricity in the State of Oregon. PGE serves over 900,000 retail customers with a service area population of approximately 2 million, comprising nearly half of the state's population. While PGE only serves retail customers in Oregon, we own and operate the Tucannon wind facility in Columbia County, Washington and transact power with Washington utilities and through the MID-C trading hub.

Ecology Should Incorporate the Concepts in the Electricity Imports White Paper into Rule:

PGE supports the comments submitted by the Western Power Trading Forum (WPTF), which recognize the Department of Ecology's 2023 endorsement of the Electricity Imports White Paper as helpful in reducing uncertainty about what qualifies as an electricity import, and which entity holds the compliance obligation. However, since this endorsement does not carry the same legal weight as the reporting regulation, we join WPTF in urging Ecology to address these issues in a future workshop and incorporate the underlying concepts into the revised regulation.

Ecology Should Account for Composite Source Points of Receipt to Avoid Double Counting and Overstating Imported Power

We also support WPTF's recommendation to include the term "composite source accounting" in the regulation to avoid double counting emissions or overstating the volume of imported power. In particular, we support WPTF's proposed revisions, including:

- A new definition of composite source:
"Composite Source Point of Receipt or composite source POR" means a Point of Receipt at which electricity generated by multiple facilities or units is aggregated."
- A new subparagraph in the imported electricity definition that exempts certain electricity: "Imported electricity does not include electricity generated from a resource located in Washington and sourced from a composite source POR located within a multistate BAA."



- A new provision requiring documentation of composite source accounting: “Additional information to document electricity separately accounted for under this chapter. The EPE must separately report for each hour of the reporting year in a format designated by Ecology:

1)The volume of electricity imports from a common source POR;

2)The volume of electricity on the e-tag generated by a generating facility or unit, or storage facility located in Washington in the same hour, and

3) The net volume of electricity imported from a common source POR after deduction of the volume of electricity in (b) above.”

PGE utilizes the MID-C wholesale interstate electric trading hub in Washington in two main ways: First, PGE brings energy transacted at this hub from resources around the West home to serve our retail customer load in Oregon. Second, PGE provides power to Washington utilities for Washington load through transmission paths through MID-C. In many cases, PGE may source or purchase power from a generator in Washington and then provide it via its MIDC Composite Source Point of Receipt to a Washington utility serving Washington load. Without a method like the “composite source accounting” (or the lesser-of-analysis illustrated in Appendix 1 of the whitepaper), the CCA is at risk of over counting emissions and PGE is at risk of being assigned an import obligation when the source of the energy delivery is in fact WA-sourced generation.

It is essential that entities like PGE have the ability to demonstrate that electricity sourced from a composite source Point of Receipt (POR)—such as the Mid-Columbia (MID-C) trading hub, located within a multistate Balancing Authority Area (BAA)—has been separately accounted for, particularly when the electricity originated from generation resources located in Washington or from a Washington-based BAA. Composite source Points of Receipt (PORs) aggregate electricity from multiple generators across state lines, so regulation must distinguish the origin of the electricity to avoid double counting emissions or overstating the volume of power considered imported under the Climate Commitment Act (CCA). Without the ability to clearly account for electricity sourced from a composite source POR, electricity that was already generated within Washington and reported for compliance purposes will be misclassified as imported.

Providing a clear pathway, such as composite source accounting, for demonstrating that specific volumes of electricity came from in-state resources allows utilities to accurately account for emissions and prevents distortions in the program. Without this tool, imported power volumes are likely to be overstated, and entities like PGE may be penalized for “importing” electricity that has already been subject to CCA regulation at the point of generation.

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